

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE PORK ANTITRUST
LITIGATION

Civil No. 18-cv-01776 (JRT/HB)

This Document Relates To:

ALL ACTIONS

**MOTION TO DISMISS THE
CONSOLIDATED AMENDED
CLASS ACTION COMPLAINTS BY
INDIANA PACKERS
CORPORATION AND MITSUBISHI
CORPORATION (AMERICAS)**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendants Indiana Packers Corporation and Mitsubishi Corporation (Americas), by and through their undersigned counsel, hereby move for dismissal with prejudice all counts against them in Plaintiffs' Consolidated Amended Class Action Complaints.¹

This Motion is based upon all of the files, records, and proceedings herein. This Motion is supported by the Memorandum of Law by Indiana Packers Corporation and Mitsubishi Corporation (Americas) in Support of Motion to Dismiss the Consolidated Amended Class Action Complaints; the Declaration of Jaime Stilson in Support of this Motion; Defendants' Joint Motion to Dismiss the Direct Purchaser Plaintiffs' Complaint and the Federal Law Claims in the Indirect Purchaser Plaintiffs' Complaints For Failure to State a Claim Upon Which Relief Can Be Granted and Memorandum of Law in support

¹ This action consolidated thirteen separately-filed actions. *See* Dkt. 85. The docket numbers for the consolidated amended complaints subject to this Motion are as follows: 18-cv-01776 (Dkt. 74); 18-cv-01891 (Dkt. 63); 18-cv-02008 (Dkt. 70); 18-cv-02044 (Dkt. 66); 18-cv-02113 (Dkt. 54); 18-cv-02337 (Dkt. 32); 18-cv-02338 (Dkt. 32).

thereof; Defendants' Joint Motion to Dismiss the State Law Claims in the Indirect Purchaser Plaintiffs' Complaints and the Memorandum of Law in support thereof; the laws applicable hereto; and the arguments of counsel.

Dated: October 23, 2018

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